

REMARKS/ARGUMENTS

Applicants have received the Office Action dated August 10, 2007 (hereinafter "Office Action"), in which the Examiner rejected claims 1-27 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Wiles, Jr. (U.S. Pub. No. 2003/0055883, hereinafter "Wiles") in view of Feldman (U.S. Pub. No. 2002/0021675, hereinafter "Feldman"). With this Response, Applicants have amended claims 1, 13 and 23 and canceled claims 2, 9 and 24. Based upon the amendments and arguments presented herein, Applicants believe all claims to be in condition for allowance.

I. THE CLAIM REJECTIONS

Applicants have amended independent claim 1 to incorporate the limitations of dependent claim 2, and have canceled claim 2. Dependent claim 9, which included limitations similar in scope to those of claim 2, has also been canceled. As amended, independent claim 1 requires, among other things, "processing a network event using the network model... ." Applicants respectfully note that although the Examiner stated that "Wiles is silent regarding: generating a network model using the parsed network representation" (Office Action, ¶ 3, p. 3), the Examiner subsequently rejected dependent claim 2, stating that "Wiles, Jr. discloses method according to claim 1, further comprising processing a network event using the network model... (see paragraph 0184 and 0275)." Office Action, ¶ 3, p. 3. Applicants respectfully submit that it is unclear how the systems and methods of Wiles can be used to process a network event, even in view of Feldman.

As acknowledged by the Examiner, Wiles does not teach generating a network model using the parsed network representation. Applicants respectfully submit that Wiles in fact does not teach or even suggest a network model at all. Wiles instead teaches performing XML token parsing, and using XML data report contents to discover domain topology configuration information. Wiles, ¶ [0132] and ¶¶ [0153-0154]. The domain topology configuration information so discovered is stored in a domain topology table in XML format, and changes to the table are detected by the XML parser. Wiles, ¶¶ [0156-0161]. The domain

topology table contains the layout of the site or sites that require monitoring, and include the domain name, web server names, Internet Protocol (IP) address, and port information. Wiles, ¶¶ [0156-0160]. A domain view, representing the status of a domain, is generated based in part on the list of discovered domains. Wiles, ¶¶ [0184-0185]. Thus, Wiles does not teach or even suggest generating a network model or a model of any kind, nor processing events using such a network model. Wiles instead teaches parsing the received XML data as part of the process of *generating* and *updating* a representation of a domain.

Regarding the citations from Wiles provided by the Examiner in support of the rejection of claim 2 (and apparently in support of the proposition that Wiles does teach a network model), Applicants respectfully note that one citation describes the “domain view” used to represent the status of a domain, and how domains can be discovered using XML data reports (Wiles, ¶ [0184]), and the other citation describes examples of dialog boxes for an embodiment of a web page editing tool (Wiles, ¶ [0275]). Neither mentions a network model, much less a network model usable to process events.

Applicants further respectfully submit that Feldman does not overcome the deficiencies of Wiles. Although Feldman does teach a data model, the data model taught is not used to process network events. The data model of Feldman is instead used “for providing a network-wide view of topology and configuration information in a packet-switched network,” such that once the data model is populated, “[c]onsistency checks can then be performed against the data.” Feldman, ¶ [0010]. Thus, it is the data within the data model of Feldman that is processed. Feldman makes no mention of receiving and processing events, much less processing such events using a network model, or any other type of model.

Thus, neither Wiles nor Feldman teaches or even suggests “processing a network event using the network model,” as previously required by dependent claim 2 and now required by amended independent claim 1. Because none of the cited art, either individually or together, teach or even suggest all of the elements of amended independent claim 1, Applicants respectfully submit that

amended independent claim 1 is not obvious over Wiles in view of Feldman. Applicants thus respectfully submit that for at least these reasons, independent claim 1, as amended, as well as those claims that depend upon it, are all in condition for allowance.

With regard to independent claims 12, 13, 20, 23 and 27, the Examiner rejected these claims under the same rationale as claims 1-11. See Office Action, ¶ 3, p. 5. Applicants have amended independent claim 13 to include limitations similar to those of canceled dependent claim 2, and have amended independent claim 23 to include the limitations of dependent claim 24. Applicants have also canceled claim 24. Amended independent claims 13 and 23 thus require processing a network event using the network model. Independent claims 12, 20 and 27 already required such event processing. Applicants respectfully submit that for at least the same reasons as described above with regard to independent claim 1, independent claims 12, 13 (as amended), 20, 23 (as amended) and 27, as well as those claims that respectively depend upon them, are all in condition for allowance.

II. CONCLUSION

In the course of the foregoing discussions, Applicants may have at times referred to claim limitations in shorthand fashion, or may have focused on a particular claim element. This discussion should not be interpreted to mean that the other limitations can be ignored or dismissed. The claims must be viewed as a whole, and each limitation of the claims must be considered when determining the patentability of the claims. Moreover, it should be understood that there may be other distinctions between the claims and the cited art which have yet to be raised, but which may be raised in the future.

Applicants respectfully request reconsideration and that a timely Notice of Allowance be issued in this case. It is believed that no extensions of time or fees are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required (including

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fees for net addition of claims) are hereby authorized to be charged to Hewlett-Packard Development Company's Deposit Account No. 08-2025.

Respectfully submitted,

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